

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

JANICE EMERSON,)	
)	
Plaintiff,)	Case No.: 1:09-wf-17066
)	
v.)	
)	
)	
LINCOLN ELECTRIC HOLDINGS,)	
INC.,)	
Defendant.)	
)	

COUNSELS' MOTION FOR PERMISSION TO FILE OPPOSITION UNDER SEAL

Ms. Emerson has filed a motion in this case seeking sanctions for an alleged violation of the Confidentiality Order entered in the *In re Welding Fume* MDL proceeding, 1:03-CV-17000. In responding to her motion, counsel intend to reference and attach as exhibits the materials that Ms. Emerson claims were disclosed in violation of the MDL Confidentiality Order. In order to respond to Ms. Emerson's Motion for Sanctions without publically disclosing the information that Ms. Emerson is now claiming is confidential, Counsel respectfully requests that they be permitted to file their opposition under seal.

Respectfully submitted,

s/Christopher B. Turney

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of February, 2015, the above and foregoing document was served via: ☒ U.S. first class mail ☐ hand-delivery ☐ facsimile; ☐ email, to:

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/s/ John H. Beisner

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